



1

2

4

6

5

7

8

9

10 11

1213

14

1516

17

18 19

2021

22

23

2425

26

27

28

KELLY & KELLY, P.C. RECEIVED

6900 EAST CAMELBACK ROAD, SUITE A-39
SCOTTSDALE ARIZONA 85251

SCOTTSDALE, ARIZONA 85251 (602) 254-7373

FAX (602) 254-3030

E-Mail: Kellylaw@aol.com

2011 JUL 21 P 12: 49

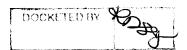
AZ CORP COMMISSION DOCKET CONTROL

Hubert E. Kelly (001725)

ATTORNEYS FOR Respondent Ross West

Arizona Corporation Commission DOCKETED

JUL 2 1 2011



BEFORE THE ARIZONA CORPORATION COMMISSION

In the matter of:

BEVERLY MICHELE WEST and ROSS WEST, wife and husband,

Respondents.

DOCKET NO. S-20806A-11-0234

ANSWER TO NOTICE OF OPPORTUNITY FOR HEARING REGARDING PROPOSED ORDER TO CEASE AND DESIST, ORDER FOR RESTITUTION AND ORDER FOR ADMINISTRATIVE PENALTIES

For his answer to the Notice of Opportunity for Hearing Regarding Proposed Order to Cease and Desist, Order for Restitution and Order for Administrative Penalties, Respondent, Ross West, admits, denies and alleges as follows:

I. JURISDICTION

1. Neither admits nor denies the allegations contained in paragraph 1. of the Notice as the matters and things therein stated are not allegations of fact.

II. RESPONDENTS

- 2. Admits the allegations contained in paragraph 2 of the Notice.
- 3. Admits that Ross West was and is the spouse of Respondent and denies the remaining allegations contained in paragraph 3 of the Notice.
 - 4. Denies the allegations contained in paragraph 4 of the Notice.

III. THROUGH VI.

5. Denies each, every and all of the allegations contained in paragraphs 5

through 31, generally and specifically, on grounds that such allegations are untrue or on grounds that matters and things alleged do not pertain to this Respondent or to matters of which he has personal knowledge; and with respect to allegations that input bad motive or faith to Respondent, Beverly West, violations of securities laws and fraud that, assuming that the same are true which this Respondent denies, this Respondent specifically denies that Respondent, Beverly West, was acting on behalf of this Respondent or on behalf of their community.

FIRST DEFENSE

As and for Respondent's First Defense he alleges that at no time did he have any knowledge of Respondent, Beverly West, engaging in the sale of unregistered securities of any aspect of such conduct ut as alleged in the Notice.

SECOND DEFENSE

As and for Respondent's Second Defense he alleges that the allegations contained in the Notice are not well-grounded in fact and are arbitrary and capricious and without merit.

THEREFORE, Respondent requests the Commission to hear this matter and deny the relief requested, dismiss the Notice and grant such other and affirmative relief as the Commission deems proper in the premises.

DATED this // day of July, 2011.

KELLY & KELLY, P.C.

Hubert E. Kelly

6900 East Camelback Road

Suite A-39

Scottsdale, AZ 85251

Attorney for Respondent Ross West

1	Copy of the foregoing mailed this day of July, 2011, to:
2	Docket Control
3	Arizona Corporation Commission 1200 West Washington Street
4	Phoenix, AZ 85007
5	Matthew J. Neubert Director of Securities
6	Securities Division
7	1300 West Washington Street, 3 rd Floor Phoenix, 62 85007
8	
9	Xous 19eg
10	
11	
12	
13	
14	
15	
16	
17	·
18	
19	
20	
21	
22	
23	
24	
25	
26	